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May 24, 2023

VIA ECF

Honorable John G. Koeltl
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Brennan v. Latch, Inc. f/k/a TS Innovation Acquisitions Corp.*
No. 1:22-cv-07473-JGK-GWG

Dear Judge Koeltl:

We represent Lead Plaintiff VB PTC Establishment as Trustee of Gersec Trust (“Gersec Trust” or “Lead Plaintiff”) in this securities class action.

Pursuant to Lead Plaintiff’s March 30, 2023, letter (Dkt. No. 48) and the Court’s Order thereon (Dkt. No. 49), we write to update the Court on the status of Latch’s restatement.

On May 19, 2023, Latch filed a Current Report on Form 8-K, attaching as Exhibit 99.1 a May 19, 2023, press release. With respect to the Company’s restatement, Latch stated:

The Company presented its plan to regain compliance with the Listing Rule (the “Compliance Plan”) at a March 23, 2023 hearing before the Panel. As set forth in the Compliance Plan, and as granted by the Panel in its decision dated April 5, 2023, the Company intends to regain compliance with the Listing Rule by filing with the SEC, on or before August 4, 2023, (i) the Annual Report, within which the Company expects to include restated financial statements for each of the Affected Periods, (ii) the 2022 Quarterly Reports, and (iii) the First Quarter 2023 Report.

Pursuant to the Court’s January 31, 2023, Order (Dkt. No. 47), within 21 days of the Company’s filing its restatement, Lead Plaintiff will file its amended complaint. Based on Latch’s

public statements, therefore, Lead Plaintiff will file its amended complaint no later than August 25, 2023. If Latch discloses anything further about its restatement, including any further delay, Lead Plaintiff will alert the Court.

If the Court has any questions, we stand ready to answer.

Respectfully,

/s/ Jacob A. Goldberg

Jacob A. Goldberg

cc: All counsel of record (via ECF)